

Appn. No.: 09/450,384
Appeal Brief dated February 3, 2005

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of:	Atty. Docket No.: 11141.80952
Mark A. Mars et al.	
Serial No.: 09/450,384	Group Art Unit: 2642
Filed: November 29, 1999	Examiner: Jack Chiang
For: Telephone wire distribution center	Confirmation No.: 7554

APPEAL BRIEF

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This is an appeal brief in accordance with 37 C.F.R. § 1.192, filed in triplicate in support of applicant's August 3, 2004, notice of appeal. Appeal is taken from the final Office Action mailed March 3, 2004. Please charge any necessary fees in connection with this appeal brief to our deposit account no. 19-0733.

I. REAL PARTY IN INTEREST

The owner of this application, and the real party in interest, is Etcon Corporation.

II. RELATED APPEALS AND INTERFERENCES

There are no related appeals and interferences.

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III. STATUS OF CLAIMS

Claims 1-6 and 8-16 are pending and rejected. Claim 7 is cancelled. All of the pending claims are shown in the attached appendix.

Claims 1-6 and 8-16 were rejected under 35 U.S.C. 103(a) as being unpatentable over Pferd et al. (U.S. Patent 3,112,147) in view of Ellsworth (U.S. Patent 240,983).

Applicant hereby appeals the rejections of claims 1-6 and 8-16.

IV. STATUS OF AMENDMENTS

There are no amendments subsequent to the final office action mailed March 3, 2004, and all prior amendments have been entered.

V. SUMMARY OF INVENTION

In making reference to various portions of the specification and drawings to explain the claimed invention (as required by 37 C.F.R. § 1.192(c)(5)), Applicant does not intend to limit the claims; all references to the specification and drawings are illustrative unless otherwise explicitly stated.

Embodiments of the invention are directed to a cost-effective apparatus and method for coupling one or more paired input telephone wires to one or more paired output telephone wires while facilitating: organizing, labeling, identification of, and switching of a particular output wire pair from a particular input pair to any of the other input wire pairs. (Page 2, lines 14-7).

A telephone distribution center, in accordance with embodiments of the invention, is disclosed for organizing and coupling multiple paired input telephone wires to multiple output telephone wires. Paired input lines may be coupled to respective pairs of punch down terminal strips. Multiple paired output lines may be coupled to one or more punch down terminal strip pairs thereby coupling one or more paired output lines to the desired input line pair or pairs. A convenient place is provided for labeling the location of the telephone jack to which each paired output wire leads. A wire channel, wire channel hooks, and tie wire loops are provided for organizing paired input and output telephone wires. Mounting holes are also provided for fastening the telephone wire distribution center to a wall or other suitable mounting surface. (Page 2, line 18, through page 3, line 6).

Referring to FIG. 1, a telephone wire distribution center 100 is shown. Distribution center 100 includes eight electrically conductive terminal strips 134-1, 134-2, 134-3, 134-4, 134-5, 134-6, 134-7, and 134-8 inserted into eight rows of insulation displacing punch down connectors 102, 104, 106, 108, 110, 112, 114, and 116 ("102-116"). Each row of insulation displacing punch down connectors 102-116, includes a plurality of insulation displacing punch down connectors, such as for instance, punch down connectors 118-1 through 118-13. (Page 3, line 17, through page 4, line 1).

To use distribution center 100 to connect one or more input telephone wire pairs to one or more output telephone wire pairs for distribution to multiple rooms throughout a house, a first wire of a first input wire pair would typically be electrically connected to a terminal strip,

such as terminal strip 134-1, for instance. Such a connection could be made by inserting an insulated wire into punch down connector 118-1. Similarly, the second wire of the first wire pair could be electrically coupled to terminal strip 134-2 via punch down connector 120-1. Once both paired wires of the first pair are connected to terminal strips 134-1 and 134-2 as just described, 12 pairs of output wires can be electrically coupled to the first paired input wire using punch down connectors 118-2 through 118-13 and the corresponding punchdown terminals in row 104. (Page 4, lines 3-15).

Second, third, and fourth paired input wires could also be electrically coupled to terminal strips 134-3 and 134-4; 134-5 and 134-6; and 134-7 and 134-8, respectively, in an analogous manner so that: terminal strip 134-3 is electrically coupled to the first wire of the second paired input wire; terminal strip 134-4 is electrically coupled to the second wire of the second paired input wire; terminal strip 134-5 is electrically coupled to the first wire of the third paired input wire; terminal strip 134-6 is electrically coupled to the second wire of the third paired input wire; terminal strip 134-7 is electrically coupled to the first wire of the fourth paired input wire; and terminal strip 134-8 is electrically coupled to the second wire of the fourth paired input wire. (Page 4, line 16, through page 5, line 2).

While input wire pairs are generally organized horizontally, in other words, along the direction indicated by double-headed arrow 144, with first through fourth input wire pairs being electrically coupled to terminals strip pairs 134-1/134-2, 134-3/134-4, 134-5/134-6, and 134-7/134-8, output wire pairs are generally organized vertically, in other words, in the

direction of double-headed arrow 146. For instance, the first paired input wire, also referred to as line 1, is coupled in series to each insulation displacing terminal connector 118-1 through 118-13. Accordingly, label area 148-1 provides space for a label such as master bedroom, or kitchen, or the like. A paired output wire could be connected to terminal connector 118-2 and the corresponding paired terminal connector of row 104 to connect the paired output wire leading to the bedroom to input line 1. To change the input line to which that paired output wire is coupled, the output wire can simply be removed from the terminal connectors 118-2 and the corresponding paired terminal connector of row 104 and connected to a different pair of terminal connectors, for instance, a pair of connectors from rows 106 and 108 for line 2, a pair of connectors from rows 110 and 112 for line 3, or rows 114 and 116 for line 4. (Page 5, line 9, through page 6, line 1).

In a similar manner, additional paired output lines can be labeled using other labeling areas below labeling area 148-1 for paired output wires leading to other rooms or locations in a house. A paired output wire leading to a particular location can then subsequently be readily identified, uncoupled from a first input line, and coupled to a different input line much more efficiently than is possible with prior art telephone wire distribution centers. (Page 6, lines 2-9).

VI. ISSUES

- 1) Whether U.S. Patent 240,983 to Ellsworth and U.S. Patent 3,112,147 to Pferd et al., teach or suggest a telephone wire distribution center comprising: a plurality of pairs of punch down terminal strips, wherein each punch down terminal strip includes a first termination area and a plurality of additional termination areas; a plurality of input-wire-pair-labeling regions for labeling a corresponding plurality of input-wire pairs, wherein the input-wire-pair-labeling regions' respective locations are substantially in line with a corresponding plurality of respective longitudinal axes of the plurality of pairs of the punch down terminal strips thereby indicating that respective pairs of the punch down terminal strips correspond to respective input-wire pairs; and a plurality of output-wire-pair-destination-labeling regions located substantially laterally with respect to the longitudinal axes of the plurality of pairs of punch down terminal strips thereby indicating that the plurality of additional termination areas correspond to a plurality of output-wire-pair destinations, such that the plurality of input-wire pairs is organized and labeled along a first axis and the plurality of output-wire-pair destinations are labeled and organized along a second axis that is substantially transverse to the first axis.
- 2) Whether U.S. Patent 240,983 to Ellsworth and U.S. Patent 3,112,147 to Pferd et al. teach or suggest a method of organizing telephone wires comprising the steps of: connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips; connecting a plurality of paired output wires to each of the plurality of pairs of electrically conductive terminal strips; and labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.
- 3) Whether U.S. Patent 240,983 to Ellsworth and U.S. Patent 3,112,147 to Pferd et al. teach or suggest a telephone distribution center comprising: means for connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips; means for connecting a plurality of paired output wires to each of the plurality of

pairs of electrically conductive terminal strips; and means for labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

VII. GROUPING OF CLAIMS

In accordance with 37 C.F.R. § 1.192(c)(7), applicant respectfully asserts that the claims do not stand or fall together. The following groups of separately patentable claims should be recognized:

GROUP I -- Claims 1-6 and 8-10;

GROUP II -- Claims 11-13; and

GROUP III -- Claims 14-16.

VIII. ARGUMENT

A. Pferd and Ellsworth, do not teach or suggest a telephone wire distribution center comprising: a plurality of pairs of punch down terminal strips attached to the front surface, wherein each punch down terminal strip includes a first termination area and a plurality of additional termination areas; a plurality of input-wire-pair-labeling regions for labeling a corresponding plurality of input-wire pairs, wherein the input-wire-pair-labeling regions' respective locations are substantially in line with a corresponding plurality of respective longitudinal axes of the plurality of pairs of the punch down terminal strips thereby indicating that respective pairs of the punch down terminal strips correspond to respective input-wire pairs; and a plurality of output-wire-pair-destination-labeling regions located substantially laterally with respect to the longitudinal axes of the plurality of pairs of punch down terminal strips thereby indicating that the plurality of additional termination areas correspond to a plurality of output-wire-pair destinations, such that the plurality of input-wire pairs

is organized and labeled along a first axis and the plurality of output-wire-pair destinations are labeled and organized along a second axis that is substantially transverse to the first axis.

Claim 1 is directed to a telephone wire distribution center comprising: a front substantially planar surface; a plurality of pairs of punch down terminal strips attached to the front surface, wherein each punch down terminal strip includes a first termination area and a plurality of additional termination areas, wherein each termination area of a particular punch down terminal strip is electrically coupled in series by the particular punch down terminal strip to every other termination area of the same punch down terminal strip; a plurality of input-wire-pair-labeling regions on the front surface for labeling a corresponding plurality of input-wire pairs, wherein the input-wire-pair-labeling regions' respective locations are substantially in line with a corresponding plurality of respective longitudinal axes of the plurality of pairs of the punch down terminal strips thereby indicating that respective pairs of the punch down terminal strips correspond to respective input-wire pairs; and a plurality of output-wire-pair-destination-labeling regions on the front surface, the plurality of output-wire-pair-destination-labeling regions' being located substantially laterally with respect to the longitudinal axes of the plurality of pairs of punch down terminal strips thereby indicating that the plurality of additional termination areas correspond to a plurality of output-wire-pair destinations, such that the plurality of input-wire pairs is organized and labeled along a first axis and the plurality of output-wire-pair destinations are labeled and organized along a second axis that is substantially transverse to the first axis.

On page 2 of the office action, the rejection of claim 1 admits that Pferd does not show input-wire-pair-labeling regions and output-wire-pair-destination-labeling regions of the type recited in claim 1. The rejection states that "Ellsworth teaches providing row and column labeling (G, H in fig. 1) of the input-wire-pair labeling region (i.e. H) and output-wire-pair-destination-labeling region (i.e. G) on the front surface of a connector block, and the output-wire-pair-destination-labeling regions (JONES, SMITH, POE) that are laid out along an axis that is substantially transverse to an axis along which a plurality of input wires (3, and label on left side of 3) is labeled." (Office Action , pages 2-3).

Applicant respectfully disagrees with the office action's characterization of what Ellsworth teaches. Ellsworth does not teach or suggest a telephone wire distribution center comprising: a plurality of input-wire-pair-labeling regions for labeling a corresponding plurality of input-wire pairs, wherein the input-wire-pair-labeling regions' respective locations are substantially in line with a corresponding plurality of respective longitudinal axes of the plurality of pairs of the punch down terminal strips thereby indicating that respective pairs of the punch down terminal strips correspond to respective input-wire pairs; and a plurality of output-wire-pair-destination-labeling regions located substantially laterally with respect to the longitudinal axes of the plurality of pairs of punch down terminal strips thereby indicating that the plurality of additional termination areas correspond to a plurality of output-wire-pair destinations, such that the plurality of input-wire pairs is organized and labeled along a first

axis and the plurality of output-wire-pair destinations are labeled and organized along a second axis that is substantially transverse to the first axis.

Ellsworth teaches a telephone central-office apparatus the object of which is to facilitate manual connection of telephone lines by a telephone operator as was done in the 1800's. Ellsworth does not teach row and column labeling. The office action refers to reference letters G and H in fig. 1 as being row and column labeling. G and H, however, are reference letters added to Figure 1 to identify "ordinary plug switches" and "ordinary annunciations," respectively. (Ellsworth, column 2, lines 77-85).

On page 2 of the office action, H is referred to as an "input-wire-pair labeling region" and G is referred to as an "output-wire-pair-destination-labeling region." Ellsworth does not teach that H is an input-wire-pair labeling region or that G is an output-wire-pair-destination-labeling region. Instead, as previously stated, G and H are reference letters added to Figure 1 to identify "ordinary plug switches" and "ordinary annunciations," respectively.

The labels "JONES," "SMITH," and "POE" are referred to in the office action as being "laid out along an axis that is substantially transverse to an axis along which a plurality of input wire pairs (3, and label on left side of 3) is labeled." (Office Action, pages 2-3). The labels "JONES," "SMITH," and "POE" are laid out along a vertical axis that is in line with the respective subscriber lines to which they pertain.

Ellsworth does not teach "a plurality of input wire pairs (3, and label on left side of 3)." Ellsworth, therefore, also does not teach such a plurality of input wires for which labels are

laid out along a horizontal axis (i.e., an axis that is substantially transverse to the axis along which the labels "JONES," "SMITH," and "POE" are laid out).

Pferd and Ellsworth, therefore, fail to teach or suggest a telephone wire distribution center comprising: a plurality of pairs of punch down terminal strips, wherein each punch down terminal strip includes a first termination area and a plurality of additional termination areas; a plurality of input-wire-pair-labeling regions for labeling a corresponding plurality of input-wire pairs, wherein the input-wire-pair-labeling regions' respective locations are substantially in line with a corresponding plurality of respective longitudinal axes of the plurality of pairs of the punch down terminal strips thereby indicating that respective pairs of the punch down terminal strips correspond to respective input-wire pairs; and a plurality of output-wire-pair-destination-labeling regions located substantially laterally with respect to the longitudinal axes of the plurality of pairs of punch down terminal strips thereby indicating that the plurality of additional termination areas correspond to a plurality of output-wire-pair destinations, such that the plurality of input-wire pairs is organized and labeled along a first axis and the plurality of output-wire-pair destinations are labeled and organized along a second axis that is substantially transverse to the first axis.

For at least the foregoing reasons, Pferd and Ellsworth do not support a proper prima facie case of obviousness of claims 1-6 and 8-10, which are in condition for allowance.

B. Pferd and Ellsworth do not teach or suggest a method of organizing telephone wires comprising the steps of: connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips; connecting a plurality of paired output wires to each of the plurality of pairs of electrically conductive terminal strips; and labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

Claim 11 is directed to a method of organizing telephone wires comprising the steps of: connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips; connecting a plurality of paired output wires to each of the plurality of pairs of electrically conductive terminal strips; and labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

On page 3 of the office action, the rejection of claim 11 admits that Pferd does not show input-wire-pair-labeling regions and output-wire-pair-destination-labeling regions of the type recited in claim 11. The rejection states that "Ellsworth teaches providing row and column labeling (G, H in fig. 1) of the input-wire-pair labeling region (i.e. H) and output-wire-pair-destination-labeling region (i.e. G) on the front surface of a connector block, and the output-wire-pair-destination-labeling regions (JONES, SMITH, POE) that are laid out along an axis that is substantially transverse to an axis along which a plurality of input wires (3, and label on left side of 3) is labeled." (Office Action , pages 3-4).

Applicant respectfully disagrees with the office action's characterization of what Ellsworth teaches. Ellsworth does not teach or suggest labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

As discussed above, Ellsworth teaches a telephone central-office apparatus the object of which is to facilitate manual connection of telephone lines by a telephone operator as was done in the 1800's. Ellsworth does not teach row and column labeling.

The office action refers to reference letters G and H in Figure 1 as being row and column labeling. G and H, however, are reference letters added to the Figure 1 to identify "ordinary plug switches" and "ordinary annunciators," respectively. (Ellsworth, column 2, lines 77-85).

On page 3 of the office action, H is referred to as an "input-wire-pair labeling region" and G is referred to as an "output-wire-pair-destination-labeling region." Ellsworth does not teach that H is an input-wire-pair labeling region or that G is an output-wire-pair-destination-labeling region. Instead, as previously stated, G and H are reference letters added to Figure 1 to identify "ordinary plug switches" and "ordinary annunciators," respectively.

The labels "JONES," "SMITH," and "POE" are referred to in the office action as being "laid out along an axis that is substantially transverse to an axis along which a plurality of input wire pairs (3, and label on left side of 3) is labeled." (Office Action, pages 3-4). The

labels "JONES," "SMITH," and "POE" are laid out along a vertical axis in line with the respective subscriber lines to which they pertain.

Ellsworth does not teach "a plurality of input wire pairs (3, and label on left side of 3)." Ellsworth, therefore, also does not teach such a plurality of input wires for which labels are laid out along a horizontal axis (i.e., an axis that is substantially transverse to the axis along which the labels "JONES," "SMITH," and "POE" are laid out).

Pferd and Ellsworth, therefore, fail to teach or suggest a method of organizing telephone wires comprising the steps of: connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips; connecting a plurality of paired output wires to each of the plurality of pairs of electrically conductive terminal strips; and labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

For at least the foregoing reasons, Pferd and Ellsworth do not support a proper prima facie case of obviousness of claims 11-13, which are in condition for allowance.

C. Pferd and Ellsworth do not teach or suggest a telephone distribution center comprising: means for connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips; means for connecting a plurality of paired output wires to each of the plurality of pairs of electrically conductive terminal strips; and means for labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

Claim 14 is directed to a telephone wire distribution center comprising: means for connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips; means for connecting a plurality of paired output wires to each of the plurality of pairs of electrically conductive terminal strips; and means for labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

On page 4 of the office action, the rejection of claim 14 admits that Pferd does not show input-wire-pair-labeling regions and output-wire-pair-destination-labeling regions of the type recited in claim 14. The rejection states that "Ellsworth teaches providing row and column labeling (G, H in fig. 1) of the input-wire-pair labeling region (i.e. H) and output-wire-pair-destination-labeling region (i.e. G) on the front surface of a connector block, and the output-wire-pair-destination-labeling regions (JONES, SMITH, POE) that are laid out along an axis that is substantially transverse to an axis along which a plurality of input wires (3, and label on left side of 3) is labeled." (Office Action , pages 4-5).

Applicant respectfully disagrees with the office action's characterization of what Ellsworth teaches. Ellsworth does not teach or suggest means for labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

As discussed above, Ellsworth teaches a telephone central-office apparatus the object of which is to facilitate manual connection of telephone lines by a telephone operator as was done in the 1800's. Ellsworth does not teach row and column labeling.

The office action refers to reference letters G and H in Figure 1 as being row and column labeling. G and H, however, are reference letters added to the Figure 1 to identify "ordinary plug switches" and "ordinary annunciators," respectively. (Ellsworth, column 2, lines 77-85).

On page 4 of the office action, H is referred to as an "input-wire-pair labeling region" and G is referred to as an "output-wire-pair-destination-labeling region." Ellsworth does not teach that H is an input-wire-pair labeling region or that G is an output-wire-pair-destination-labeling region. Instead, as previously stated, G and H are reference letters added to Figure 1 to identify "ordinary plug switches" and "ordinary annunciators," respectively.

The labels "JONES," "SMITH," and "POE" are referred to in the office action as being "laid out along an axis that is substantially transverse to an axis along which a plurality of input wire pairs (3, and label on left side of 3) is labeled." (Office Action, pages 4-5).

The labels "JONES," "SMITH," and "POE" are laid out along a vertical axis in line with the respective subscriber lines to which they pertain. Ellsworth does not teach "a plurality of input wire pairs (3, and label on left side of 3)." Ellsworth, therefore, also does not teach such a plurality of input wires for which labels are laid out along a horizontal axis (i.e., an axis that is substantially transverse to the axis along which the labels "JONES," "SMITH," and "POE" are laid out).

Pferd and Ellsworth, therefore, fail to teach or suggest a telephone distribution center comprising: means for connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips; means for connecting a plurality of paired output wires to each of the plurality of pairs of electrically conductive terminal strips; and means for labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

For at least the foregoing reasons, Pferd and Ellsworth do not support a proper *prima facie* case of obviousness of claims 14-16, which are in condition for allowance.

IX. RESPONSE TO ARGUMENT SECTION OF THE OFFICE ACTION

On page 6, the office action states that "[t]he examiner likes to comment that the idea of row and column labeling is well taught by Verhagen" and that "[a]lthough the examiner could have maintained the Verhagen rejection, ... to better meet the claimed language [sic., languages] Verhagen is replaced by Ellsworth."

In response to the foregoing statements from page 6 of the office action, Application respectfully states that Verhagen (U.S. Patent 4,140,885) does not teach or suggest output-wire-pair-destination-labeling regions that are laid out along an axis that is substantially transverse to an axis along which a plurality of input-wire pairs is labeled.

Verhagen discloses a modular interchange termination system for key telephones. The system includes programmable termination fields for flexibility in providing and altering key telephone functions. (Abstract).

The non-final office action mailed July 9, 2003, cites Figure 7 of Verhagen in support of the proposition that "Verhagen teaches providing a row and column labeling (fig. 7) of the wire pairs on the front surface of a connector block." (Non-final office action mailed July 9, 2003, page 2).

Verhagen does not, however, teach or suggest a plurality of output-wire-pair-destination-labeling regions organized along an axis that is substantially transverse to an axis along which a plurality of input-wire pairs is labeled. Instead, Verhagen discloses color-coding of telephone-line functionality. (Verhagen, col. 6, lines 18-20).

Significantly, Figure 7 of Verhagen does not teach or suggest labeling of output-wire-pair destinations. Instead, the color-coding abbreviations that appear in Figure 7 were added to that drawing for illustrative purposes only to convey color-coding information via a black-and-white line drawing that complies with applicable U.S. Patent Office regulations for formal drawings. (Verhagen, col. 5, line 51, though col. 6, line 34).

Figure 7 of Verhagen does not, therefore, teach or suggest output-wire-pair-destination-labeling regions. Consequently, Verhagen also does not teach or suggest laying out output-wire-pair-destination-labeling regions along an axis that is substantially transverse to an axis along which a plurality of input-wire pairs is labeled.

X. CONCLUSION

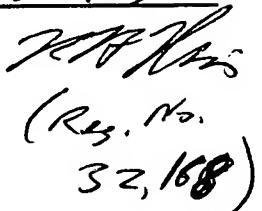
For all of the foregoing reasons, applicant respectfully submits that the final rejection of claims 1-6 and 8-16 is improper and should be reversed.

Respectfully submitted,

BANNER & WITCOFF, LTD.

Dated: February 3, 2005

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APPENDIX

CLAIMS INVOLVED IN THE APPEAL

Claim 1 (previously presented): A telephone wire distribution center comprising:

a front substantially planar surface;

a plurality of pairs of punch down terminal strips attached to the front surface, wherein each punch down terminal strip includes a first termination area and a plurality of additional termination areas, wherein each termination area of a particular punch down terminal strip is electrically coupled in series by the particular punch down terminal strip to every other termination area of the same punch down terminal strip;

a plurality of input-wire-pair-labeling regions on the front surface for labeling a corresponding plurality of input-wire pairs, wherein the input-wire-pair-labeling regions' respective locations are substantially in line with a corresponding plurality of respective longitudinal axes of the plurality of pairs of the punch down terminal strips thereby indicating that respective pairs of the punch down terminal strips correspond to respective input-wire pairs; and

a plurality of output-wire-pair-destination-labeling regions on the front surface, the plurality of output-wire-pair-destination-labeling regions' being located substantially laterally with respect to the longitudinal axes of the plurality of pairs of punch down terminal strips thereby indicating that the plurality of additional termination areas correspond to a plurality of output-wire-pair destinations, such that the plurality of input-wire pairs is organized and

labeled along a first axis and the plurality of output-wire-pair destinations are labeled and organized along a second axis that is substantially transverse to the first axis.

Claim 2 (original): The telephone wire distribution center of claim 1, wherein the front surface comprises: a wire channel for routing paired telephone wires.

Claim 3 (original): The telephone wire distribution center of claim 2, further comprising: at least one wire channel hook for retaining wire pairs in the wire channel.

Claim 4 (original): The telephone wire distribution center of claim 2, wherein the wire channel is located between two pairs of the punch down terminal strips.

Claim 5 (original): The telephone wire distribution center of claim 4, wherein the wire channel separates a first two pairs of the punch down terminal strips from a second pair of the punch down terminal strips.

Claim 6 (previously presented): The telephone wire distribution center of claim 5, further comprising a label for each input telephone-wire pair electrically coupled to one of the punch down terminal strips.

Claim 7 (cancelled).

Claim 8 (original): The telephone wire distribution center of claim 1, further comprising: at least one tie-wire ring for bundling a plurality of wires to the distribution center.

Claim 9 (original): The telephone wire distribution center of claim 1, wherein at least one of the punch down terminal strips comprises a row of insulation displacing connectors.

Claim 10 (original): The telephone wire distribution center of claim 9 wherein at least one punch down terminal strip comprises: an electrically conductive terminal strip inserted into a row of insulation displacing connectors.

Claim 11 (previously presented): A method of organizing telephone wires comprising the steps of:

connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips;

connecting a plurality of paired output wires to each of the plurality of pairs of electrically conductive terminal strips; and

labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

Claim 12 (original): The method of organizing telephone wires as in claim 11, further comprising the step of: routing paired telephone wires through wire channel hooks in a wire channel of the wire distribution center.

Claim 13 (original): The method of organizing telephone wires as in claim 12, further comprising the step of: bundling the plurality of wires in the wire channel.

Claim 14 (previously presented): A telephone wire distribution center comprising:

means for connecting a plurality of paired input wires to a respective plurality of labeled pairs of electrically conductive terminal strips;

means for connecting a plurality of paired output wires to each of the plurality of pairs of electrically conductive terminal strips; and

means for labeling output-wire-pair destinations on the distribution center such that the output-wire-pair destinations are labeled along an axis that is substantially perpendicular to an axis along which the plurality of pairs of electrically conductive terminal strips are labeled.

Claim 15 (original): The telephone wire distribution center as in claim 14, further comprising:

means for routing paired telephone wires through wire channel hooks in a wire channel of the wire distribution center.

Claim 16 (original): The telephone wire distribution center as in claim 15, further comprising:

means for bundling the plurality of wires in the wire channel.